

**DIVISION OF AIR AND WATER QUALITY
AIR PERMITS PROGRAM**

555 Cordova Street
Anchorage, AK 99501-2617
PHONE: (907) 269-7575
FAX: (907) 269-7508
<http://www.state.ak./dec/>

**CERTIFIED MAIL NO: 7000 0520 0024 4825 8645
RETURN RECEIPT REQUESTED**

June 19, 2001

Mr. Donald L. Dietz, Port Director
2000 Anchorage Port Road
Anchorage, AK 99501

Re: Notification of decision to approve Owner Requested Limit for the Municipality of Anchorage's
Port of Anchorage ORL No. 509ORL01

Dear Mr. Dietz:

This notification is to advise you to disregard the owner requested limit a sent to you on June 21, 2001, it was inadvertently mailed to you with no final signature from the Department. The enclosed letter of approval bears both the owner/operator's and the Department's signature.

The Department received your application for an Owner Requested Limit (ORL) dated December 4, 2000 seeking an owner-requested limit(s) for the Municipality of Anchorage's (MOA) Port of Anchorage (POA) located at 2000 Anchorage Port Road, Anchorage, Alaska. Based on the supplied information, your notarized certification, and a finding that your request meets the requirements of 18 AAC 50.225(b), the Department has decided to issue an approval of the limits requested in your application. The Department conducted a 30-day public comment period starting May 10th and ending June 11, 2001.

MOA's proposed limit, contained herein, shall apply to the annual volatile organic compound (VOC) emission limit of 90 tons per year for all marine bulk petroleum tank vessel- and barge-loading operations at the Facilities. It will also apply to a hazardous air pollutants (HAPs) emission limit of 10 tons per year or more of a hazardous air contaminant or 25 tons per year or more, in the aggregate of two or more hazardous air contaminates for all marine bulk petroleum tank vessel- and barge-loading operations at the Facilities.

Clean Air, Clean Water

June 19, 2001

The conditions contained within this ORL are intended to ensure that the VOC emission limit of 90 tons per year is not exceeded, and the total potential emissions of VOC do not exceed 100 tons per year. The conditions also ensure the HAPs emission limit of 10 tons per year or more of a hazardous air contaminant or 25 tons per year or more, in the aggregate of two or more hazardous air contaminants is not exceeded.

This is a preliminary permit action for purposes of review under AS 46.14.200. A person who has a private, substantive, legally-protected interest under State law that may be adversely affected by the permit action, the owner and operator, or a person who participated in the public comment process may request an adjudicatory hearing under 18 AAC 15.200-910. The request should be mailed to the Commissioner, Alaska Department of Environmental Conservation, 410 Willoughby Avenue, Suite 105, Juneau, Alaska 99801-1795, by certified mail, return receipt requested. A copy of the request shall also be sent to the undersigned. The right to administrative review will be waived if no request for an adjudicatory hearing is served within 30 days of the date of this letter. Any hearing granted will be limited to issues related to the issuance of this Owner Requested Limit approval. If an adjudicatory hearing is thereafter granted, all ORL conditions remain in full force and effect.

ORL No. 509ORL01 will become effective the day after the department receives a copy of the enclosed letter of approval bearing the owner's or operator's notarized signature in the space provided.

Should you have questions regarding this action or other related matters, please contact Kathy Stringham at (907) 451-2114 or me at the number shown above.

Sincerely,

Bill MacClarence, P.E.
Supervisor Air Operating Permits

Enclosure: Owner Requested Limit No. 509ORL01

cc: John Kuterbach, ADEC/AAP, Juneau
Bob Cannone, P.E., ADEC/APP Fairbanks
Susan Reeves, Foster, Pepper, Rubini, & Reeves, LLC (w/encl.)
William Greene, Municipality of Anchorage (w/encl.)
Kathy Stringham, ADEC/APP Fairbanks
Laurie Kral, EPA Region 10, Seattle (w/encl.)
John Pavitt, EPA/AOO

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Municipality of Anchorage, Port of Anchorage
509ORL01

June 19, 2001

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Clean Air, Clean Water

**State of Alaska - Air Operating Permit Program
Owner Requested Limit**

FACILITY IDENTIFICATION:

No. 509ORL01

Owner/Operator:	Municipality of Anchorage
Facility Name:	Port of Anchorage
Facility Address:	2000 Anchorage Port Road
City, State, Zip:	Anchorage, AK 99501
Latitude/Longitude:	Latitude 61° 14', Longitude 149° 53'
Facility Contact:	Mr. Donald L. Dietz
Phone Number:	(907) 343-6200

The above-named owner/operator has submitted a complete application for an owner-requested limit under 18 AAC 50.225(b) for the Port of Anchorage. The Department grants an owner-requested limit to restrict the potential to emit of the facility to avoid the requirement for an operating permit under 18 AAC 50.325(b)(1) and (b)(2), and to ensure protection of ambient air quality standards and increments established in 18 AAC 50.010. The Department certifies that the owner-requested limit is effective as of the date noted below.

In accordance with 18 AAC 50.225(f), the applicant has agreed to the conditions listed on the following pages.

The owner or operator may revise this limit under 18 AAC 50.225(h) by submitting a new request under 18 AAC 50.225(b). This limit remains in effect until the revision is approved. The owner or operator may terminate this limit according to the procedures of 18 AAC 50.225(h).

I understand and agree to the terms and conditions of this approval.

Owner or Operator

Printed Name

Title: _____

This certifies that on _____, (date) the person named above appeared before me, a notary public
in _____ and for the State of _____, and signed the above statement in my presence.

Notary Signature & Seal _____

My commission expires: _____

Department approval:

Bill MacClarence, P.E.
Supervisor Air Operating Permits

Owner Requested Limit Effective Date

CONDITIONS:

1. Municipality of Anchorage (MOA) shall limit the sources operating at the Port of Anchorage (POA) to the two fuel loading berths at the dock and piping from the Valve Yard isolation valve across the Port dock to the two fuel loading berths. These facilities are diagrammed in their application.
2. MOA shall keep the volatile organic compound (VOC) emission to less than 90 tons per year for all marine bulk petroleum tank vessel- and barge-loading operations at the Facilities described in their application. MOA shall also keep the individual hazardous air pollutant (HAP) emission limited to 10 tons per year or less or 25 tons per year or less, in the aggregate, for all marine bulk petroleum tank vessel- and barge-loading operations at the Facilities described in their application.
3. MOA shall receive and maintain records, provided by the Operators, of volumes of each product loaded at the POA and the calculated VOC emissions. The Municipality will summarize the emissions and submit the summary to the Department on or before January 30th of each year.
4. In accordance with the Marine Tanker Vessel Loading Operator Agreement with each Operator, the Municipality will require each Operator to:
 - 4.1 Compile the volumes and types of fuel loaded, and calculate the VOC emissions using the methods described in this ORL, on a monthly basis.
 - 4.2 Each Operator will provide this information on a standard monthly Port of Anchorage Certified Fuel Loading Report on the tenth of the month following any operation of the POA by that Operator.
5. When required by Condition 4.1, calculate VOC emissions as follows:

$$\text{VOC}_{\text{ton/yr}} = [(1.7 \times 10^{-6} \text{ ton/gal})(\text{Vol}_{\text{gal/yr}})]_{\text{gasoline}} + [(1.6 \times 10^{-7} \text{ ton/gal})(\text{Vol}_{\text{gal/yr}})]_{\text{blendstock}} + [(1.5 \times 10^{-9} \text{ ton/gal})(\text{Vol}_{\text{gal/yr}})]_{\text{kerosene}} + [(1.0 \times 10^{-9} \text{ ton/gal})(\text{Vol}_{\text{gal/yr}})]_{\text{diesel}}$$

where,

$\text{VOC}_{\text{ton/yr}}$ = The total VOC emissions in tons for a consecutive twelve month period.

$\text{Vol}_{\text{gal/yr}}$ = The total volume of gasoline, blendstock, kerosene, and diesel, respectively, loaded onto marine vessels during the same consecutive twelve month period, gal/yr.

The emission factors used in the equation are:

Product	VOC EF, lb/1000 gal	VOC EF, ton/gal	Reference
Gasoline	3.4	1.7×10^{-6}	AP-42, Table 5.2-2
Blendstock	0.32	1.6×10^{-7}	AP-42, Tables 5.2-1 and 7.1-2
Kerosene	0.003	1.5×10^{-9}	AP-42, Tables 5.2-1 and 7.1-2
Diesel	0.002	1.0×10^{-9}	AP-42, Tables 5.2-1 and 7.1-2

6. The Municipality will review the information provided by each Operator. If the total VOC or HAPs emission during any reporting period (consecutive twelve month) total 80% or more of the ORL, the Municipality will notify the ADEC and will require each Operator to request pre-approval of any loading event.
7. MOA shall submit two copies and the original of the annual compliance report to the Alaska Department of Environmental Conservation, Air Permits Program, 610 University Avenue, Fairbanks, Alaska, 99709-3643. The annual compliance report is due by January 30th of each year and shall cover the period for the preceding year. The annual compliance report shall contain the certification statement listed in 18 AAC 50.205.
8. MOA shall report any excess air emissions or deviations from the air quality stipulations to ADEC no later than seven days after discovering the exceedance or deviation. To report the excess emissions, MOA must fax a completed and signed Excess Emission Notification Form to ADEC at (907) 269-7508. The Excess Emission Notification Form may be obtained from ADEC's web page at: <http://www.state.ak.us/dec/dawq/aqm/eeform.pdf>.
9. MOA shall keep copies of reports and certifications required by this Owner Requested Limit for a period of 5 years.

Statement of Avoided Requirement:

The potential to emit for the sources is reduced to less than 100 tons per year by limiting the total VOC. Also, potential to emit for the sources are reduced to 10 tons per year or less of a hazardous air contaminant or 25 tons per year or less, in the aggregate, of two or more hazardous air contaminants by limiting the total HAPs emissions. In accordance with 18 AAC 50.210, the capacity of the facility to emit an air contaminant is verifiable through the monitoring, record keeping, and reporting contained in this owner requested limit. By limiting the potential to emit of the sources, the owner/operator is avoiding the requirement to obtain an operating permit by avoiding classification of the Port of Anchorage under AS 46.14.130(b), and 18 AAC 50.325(b)(1) and (b)(2).

ADEC Notification Form

Fax this form to: (907) 269-7508

Telephone: (907) 269-8888

Company Name _____

Facility Name _____

(A) Reason for notification:

☐ **Excess Emission**

☐ **Permit Condition Deviation**

(B) Event Information (Use 24-hour clock):

	START Time:	END Time:	Duration (hr:min):
Date: _____	_____:_____	_____:_____	_____:_____
Date: _____	_____:_____	_____:_____	_____:_____
		Total:	_____:_____

(C) Cause of Event (Check all that apply):

☐ START UP

☐ UPSET CONDITION

☐ CONTROL EQUIPMENT

☐ SHUT DOWN

☐ SCHEDULED MAINTENANCE

☐ OTHER _____

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(D) Sources Involved:

Identify each Emission Source involved in the event, using the same identification number and name as in the Permit. List any Control Device or Monitoring System affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____

(E) Emission Limit Exceeded and/or Permit Condition Deviation:

Identify each Emission Standard and Permit Condition potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Attach additional sheets as necessary.

Permit Condition	Limit	Exceedence
_____	_____	_____
_____	_____	_____

(F) Emission/Deviation Reduction:

Attach a description of the measures taken to minimize and/or control emissions or permit condition deviations during the event.

(G) Corrective Actions:

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____

Signature: _____

Date: _____